

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re: ) Chapter 11  
          )  
Squirrels Research Labs LLC *et al.*,<sup>1</sup> ) Case No. 21-61491  
          ) (Jointly Administered)  
Debtors. )  
          ) Judge Russ Kendig

**NOTICE OF MOTION OF DEBTORS AND DEBTORS-IN-POSSESSION FOR  
ENTRY OF AN ORDER: (I) ESTABLISHING PROCEDURES FOR INTERIM  
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS  
ON A MONTHLY BASIS AND (II) LIMITING SERVICE OF NOTICES OF  
HEARINGS ON INTERIM APPLICATIONS FOR COMPENSATION**

PLEASE TAKE NOTICE THAT on December 8, 2021, the debtors and debtors-in-possession (each a “Debtor” and collectively, the “Debtors”), in the above-captioned Chapter 11 cases, filed the *Motion of Debtors and Debtors-in-Possession For Entry of an Order: (I) Establishing Procedures For Interim Compensation and Reimbursement of Expenses of Professionals on a Monthly Basis and (II) Limiting Service of Notices of Hearings on Interim Applications For Compensation* (the “Motion”).

**Your rights may be affected.** You should read the Motion carefully and discuss it with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

Pursuant to Local Rule 9013-1(b), if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then on

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

or before **December 22, 2021**, you or your attorney must file with the Court a written objection explaining your position at:

United States Bankruptcy Court  
Office of the Clerk  
Ralph Regula Federal Building and U.S. Courthouse  
401 McKinley Avenue, SW  
Canton, Ohio 44702

You must also serve a copy of your request on the undersigned counsel:

Marc B. Merklin  
Julie K. Zurn  
Bridget A. Franklin  
Brouse McDowell LPA  
388 S. Main Street, Suite 500  
Akron, Ohio 44311

*Proposed Counsel for the  
Debtors and Debtors-in-Possession*

Pursuant to Local Rule 9013-1(d), if you or your attorney do not take these steps, the Court may grant the relief requested without conducting a hearing and without further notice to you.

Dated: December 8, 2021

Respectfully submitted,

/s/ Julie K. Zurn  
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